

June 15, 2011,

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE THIRD JUDICIAL CIRCUIT  
MADISON COUNTY  
(618) 296-4464  
WWW.CO.MADISON.IL.US



CASE No. 2011 L 000565

DATE: June 15, 2011

CHRISTOPHER SANDS

PLAINTIFF

VS.

OLIN CORPORATION  
CT CORPORATION  
208 S LASALLE STREET SUIT  
CHICAGO IL

DEFENDANT

DEFENDANT: OLIN CORPORATION

You are hereby summoned and required to file an answer in this case, or otherwise file your appearance, in the office of the Madison County Circuit Clerk, within 30 days after service of this summons, exclusive of the day of service. If you fail to do so, a judgment or decree by default may be taken against you for the relief prayed in the complaint.

This summons must be returned by the officer or other person to whom it was given for service, with endorsement thereon of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed.

This summons may not be served later than 30 days after its date.

Witness MATT MELUCCI the Clerk of said Circuit Court and the seal thereof, at Edwardsville, Illinois, this June 15, 2011.



MATT MELUCCI  
CLERK OF THE CIRCUIT COURT

BY: Melodie Smith  
Deputy Clerk

(Plaintiff's attorney or plaintiff if he is not represented by an attorney)

THOMAS C. RICH  
THOMAS C RICH PC  
6 EXECUTIVE DR STE 3  
FAIRVIEW HEIGHTS IL 62208

Date of Service: \_\_\_\_\_, 20 \_\_\_\_\_.  
(To be inserted by officer on the copy left with the defendant or other person)

IN THE CIRCUIT COURT FOR THE FOURTH JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

FILED

JUN 15 2011

CLERK OF CIRCUIT COURT #76  
THIRD JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

CHRISTOPHER SANDS, )  
Plaintiff, )  
vs. )  
OLIN CORPORATION., a corporation, )  
Defendant. )

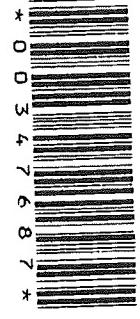
Case No.

11-L-565

COMPLAINT

COUNT I

(Retaliatory Discharge/Compensatory Damages)  
Christopher Sands v. Olin Corporation, a corporation



Now comes the Plaintiff, Christopher Sands, by and through his attorney, THOMAS C. RICH, P.C., and for his cause of action against the Defendant, Olin Corporation., a corporation, respectfully represents unto the Court as follows:

1. That the Defendant, the Olin Corporation, a corporation, was at all times relevant hereto in the metal business located at 600 Powder Mill Road, in the City of East Alton, in the County of Madison, and the State of Illinois.
2. That the Plaintiff, Christopher Sands, is a citizen of the City of Belleville, County of St. Clair, and the State of Illinois.
3. That from January 15, 2010 and continuously until December 17, 2010, the Plaintiff was an employee of the Defendant, Olin Corporation., a corporation.
4. That on September 15, 2010 and November 4, 2010, the Plaintiff, Christopher Sands, sustained accidental injuries arising in and out of the course and scope of his employment with the Defendant, causing him severe and permanent injuries.
5. That on or about September 15, 2010 and November 4, 2010, the Plaintiff,

Christopher Sands, reported his injury to his employer and, at all times thereafter, exercised his rights under the Illinois Workers' Compensation Act, by filing a claim, seeking medical treatment, taking time off work, and receiving benefits.

6. That on December 17, 2010, the Plaintiff was terminated from his employment with the Defendant in retaliation for exercising his rights under the Illinois Workers' Compensation Act when he was terminated under the pretext of violation of the General Plant Rule I-3 but was actually terminated due to his exercise of rights under the Illinois Workers' Compensation Act.

7. That on December 17, 2010, Defendant terminated Plaintiff under the guise and pretext of an elimination of his position, but the motive for Plaintiff's termination was actually Defendant's desire and motive to retaliate against Plaintiff because he had exercised his rights under the Illinois Workers' Compensation Act.

8. That as a direct and proximate result of the Defendant intentionally terminating the Plaintiff in retaliation for exercising his rights under the Illinois Workers' Compensation Act, the Plaintiff has been injured as follows:

- a. He has lost substantial wages which he would have otherwise earned from the Defendant, and will continue to lose wages in the future;
- b. He has lost health and dental insurance coverage;
- c. He has lost seniority, vacation time and sick time that he would have from the Defendant;
- d. He has lost 401(k) benefits and/or pension benefits; and
- e. He has experienced pain and suffering and emotional distress.

**WHEREFORE**, the Plaintiff, Christopher Sands, prays judgment against the Defendant, Olin Corporation, a corporation, for a fair and just award in excess of Fifty Thousand Dollars (\$50,000.00) plus costs of this suit.

**COUNT II**  
**(Retaliatory Discharge/Punitive Damages)**  
**Christopher Sands v. Olin Corporation, a corporation**

Now comes the Plaintiff, Michael Franklin, by and through his attorneys, THOMAS C. RICH, P.C., and for his cause of action against the Defendant, Morgan's Foods, Inc., a corporation, respectfully represents unto the Court as follows:

1. That the Defendant, the Olin Corporation, a corporation, was at all times relevant hereto in the metal business located at 600 Powder Mill Road, in the City of East Alton, in the County of Madison, and the State of Illinois.
2. That the Plaintiff, Christopher Sands, is a citizen of the City of Belleville, County of St. Clair, and the State of Illinois.
3. That from January 15, 2010 and continuously until December 17, 2010, the Plaintiff was an employee of the Defendant, Olin Corporation., a corporation.
4. That on September 15, 2010 and November 4, 2010, the Plaintiff, Christopher Sands, sustained accidental injuries arising in and out of the course and scope of his employment with the Defendant, causing him severe and permanent injuries.
5. That on or about September 15, 2010 and November 4, 2010, the Plaintiff, Christopher Sands, reported his injury to his employer and, at all times thereafter, exercised his rights under the Illinois Workers' Compensation Act, by filing a claim, seeking medical treatment, taking time off work, and receiving benefits.

6. That on December 17, 2011, the Defendant willfully and intentionally terminated Plaintiff from his employment under the pretext of violation of General Plant Rule I-3 but was actually terminated due to his exercise of rights under the Illinois Workers' Compensation Act.

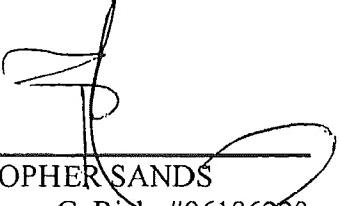
7. That on December 17, 2010, the Plaintiff was willfully and intentionally terminated from his employment with the Defendant in retaliation for exercising his rights under the Illinois Workers' Compensation Act when he was terminated under the pretext of violation of General Plant Rule I-3 but was actually terminated due to Defendant's desire and motivation to retaliate against Plaintiff for exercising his rights under the Illinois Workers' Compensation Act, as Plaintiff has been absent from work due to his injuries from his workers compensation case.

8. That as a direct and proximate result of the Defendant intentionally terminating Plaintiff in retaliation for exercising his rights under the Illinois Workers' Compensation Act, the Plaintiff has been injured as follows:

- a. He has lost substantial wages which he would have otherwise earned from the Defendant, and will continue to lose wages in the future;
- b. He has lost health and dental insurance coverage;
- c. He has lost seniority, vacation time and sick time that he would have from the Defendant;
- d. He has lost 401(k) benefits and/or pension benefits; and
- e. He has experienced pain and suffering and emotional distress.

**WHEREFORE**, the Plaintiff, Christopher Sands, prays judgment against the Defendant, Olin Corporation, a corporation, for a fair and just award in excess of Fifty Thousand Dollars (\$50,000.00) in punitive damages plus costs of this suit.

RESPECTFULLY SUBMITTED,

  
\_\_\_\_\_  
CHRISTOPHER SANDS  
BY: Thomas C. Rich, #06186229  
Kristina D. Cooksey, #6299549

THOMAS C. RICH, P.C.  
Thomas C. Rich, #06186229  
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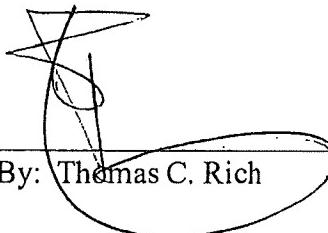
IN THE CIRCUIT COURT FOR THE FOURTH JUDICIAL CIRCUIT  
MADISON COUNTY, ILLINOIS

CHRISTOPHER SANDS, )  
Plaintiff, )  
vs. ) Case No.  
OLIN CORPORATION., a corporation, )  
Defendant. )

**AFFIDAVIT**

Now come Thomas C. Rich, P.C. attorneys for the Plaintiff in the above titled action and at the time of the filing of this Complaint have reasonable grounds to believe that the damages to the Plaintiff as a result of the injuries sustained herein will be in excess of Fifty Thousand Dollars (\$50,000.00).

6/14/12  
Date

By:  Thomas C. Rich

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Kristina D. Cooksey #6299549  
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